

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

MARK I. SOKOLOW, et al.

Plaintiffs,
v.
Civ. No. 04-00397-GBD

THE PALESTINE LIBERATION ORGANIZATION, et al.,

Defendants.

DECLARATION OF MORRIS WALDMAN

I, Morris Waldman, declare pursuant to 28 U.S.C. § 1746, as follows:

1. I am a plaintiff in the above-captioned case. At the time the complaint and the amended complaint in this case were filed I resided in Brooklyn, New York, and I remain a resident of Brooklyn until the present day.
2. I intend to attend and testify at the trial in this case. Because I live in Brooklyn, transferring this case to the U.S. District Court for the Eastern District of New York in Brooklyn would be extremely convenient for me. By contrast, transferring this case to the District of Columbia would be extremely inconvenient and expensive for me. I would have to bear the expenses involved in traveling to the D.C. area, as well as the huge costs and inconveniences of living in a hotel room and eating in a hotel or in restaurants during the course of the trial. Also, I work in New York and I would have to take off entirely from work during the trial, which would entail a further loss. Most importantly, I take care of my widowed mother, who is in her nineties, and holding a trial in D.C. would prevent me from caring for my mother during the trial.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

April 27, 2011



Morris Waldman